

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-cv-60984-Rosenberg/Augustin-Birch**

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO LLC, and  
MICHAEL SPANOS A/K/A MIKE SPANOS,

Defendants.

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**JOINT DISCOVERY STATUS REPORT**

Pursuant to this Court's Order dated July 30, 2024 (DE 19), the Parties hereby submit their Joint Discovery Status Report:

1. On September 25, 2024, Plaintiff served on Defendants:
  - a. Melinda Michaels's First Set of Interrogatories to Defendant SeaWater Pro LLC
  - b. Melinda Michaels's First Set of Interrogatories to Defendant Michael Spanos
  - c. Melinda Michaels's First Request for Production to Defendant SeaWater Pro LLC
  - d. Melinda Michaels's First Request for Production to Defendant Michael Spanos
  - e. Melinda Michaels's First Request for Admissions to Defendant SeaWater Pro LLC
  - f. Melinda Michaels's First Request for Admissions to Defendant Michael Spanos
2. On September 25, 2024, Defendants served on Plaintiff:
  - a. Defendants' First Set of Interrogatories to Plaintiff
  - b. Defendants' First set of Requests for Production to Plaintiff
  - c. Defendants' First Request for Admissions to Plaintiff

3. On October 24, 2024, upon notice of substitution of counsel, the Parties agreed to a mutual 30-day extension for responses to discovery through November 25, 2024.
4. On October 31, 2024, the Court granted Defendants' Substitution of Counsel (DE 35).
5. Pursuant to the Court's scheduling order dated July 30, 2024:
  - a. Expert witness disclosure deadline is November 7, 2024
  - b. Fact discovery deadline is December 7, 2024
  - c. Expert discovery deadline is December 23, 2024
6. On November 5, 2024:
  - a. Seawater Pro LLC responded to the First Request for Admissions served on it
  - b. Michael Spanos responded to the First Request for Admissions served on it
7. As of November 5, 2024:
  - a. Defendants have not yet responded to the Interrogatories or Requests for Production served on them
  - b. Plaintiffs have not yet responded to the discovery requests served on them
  - c. No depositions have been taken or scheduled
    - i. Defendants recently (on October 30, 2023) had new counsel appear in and assume the defense of this case, which has delayed their responses to discovery and their taking depositions. Defendants have requested dates to depose Plaintiff. Defendants made seek other depositions based on the Plaintiff's discovery responses.
    - ii. Plaintiff plans to depose Michael Spanos, and Michael Spanos as 30(b)(6) corporate representative prior to the discovery deadline
  - d. No experts have been disclosed by either party

- e. There are no outstanding discovery disputes at the present time.
- f. The parties cannot certify that all discovery will be completed by December 7, 2024, as the timing and contents of the parties' respective discovery responses may result in the need for the Court to consider a discovery dispute and/or for the parties to conduct follow-up discovery. The parties anticipate requesting a 45-day extension of the discovery and related deadlines.

Respectfully Submitted,

Dated: November 5, 2024

/s/Dillon S. Cuthbertson

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